

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DOROTHY A. LANGFORD,

Plaintiff,

V.

**McDONALD'S CORPORATION and
BUDDY ROGERS,**

Defendants.

**CIVIL ACTION NUMBER:
2:06-cv-01025-WKW**

**JOINT MOTION TO AMEND SCHEDULING ORDER TO EXTEND
ALL REMAINING DEADLINES BY NINETY (90) DAYS**

Plaintiff and Defendant DBR, Inc. hereby move the Court to amend the Scheduling Order entered in this case to extend all remaining deadlines by ninety (90) days. As grounds for this motion, the parties respectfully shows the Court as follows:

1. Plaintiff's original Complaint in this action was filed on November 15, 2006.
2. On April 30, 2007, Plaintiff moved to amend her Complaint again to add DBR, Inc. as a defendant.
3. DBR, Inc. was added as a Defendant by Order dated August 14, 2007. The Court's August 14, 2007 Order requires Plaintiff to file an amended complaint by August 17, 2007 and for Defendant DBR, Inc. to answer that complaint by August 31, 2007.
4. On February 2, 2007, six months before DBR, Inc. was added as a defendant to this case, the Court entered a Uniform Scheduling Order setting forth certain deadlines.

5. Despite having only just been added to the case, DBR, Inc. is currently faced with the following deadlines:

- a. Dispositive Motions Deadline: September 7, 2007.
- b. Discovery Deadline: October 15, 2007.
- c. Pre-trial Conference: October 29, 2007.
- d. Witness and Exhibit List Due: November 10, 2007.
- e. Voir Dire, Jury Instructions and
Motions in Limine Due: November 26, 2007.
- f. Trial: December 10, 2007.

6. Defendant plans to issue written discovery to Plaintiff as soon as practicable, but Plaintiff's responses will not even be due before the current discovery deadline, leaving Defendant no opportunity to take evaluate the responses before taking depositions and conducting third party discovery.

7. The requested additional ninety (90) days on all remaining deadlines will be required to allow the parties time to complete necessary discovery and prepare for trial, if necessary.

WHEREFORE, Plaintiff and Defendant DBR, Inc. respectfully request that the Court amend the Scheduling Order entered in this case to extend all remaining deadlines by ninety (90) days.

Respectfully Submitted,

s/Sally B. Waudby
Sally B. Waudby ASB-4704-W84S
swaudby@lehrmiddlebrooks.com
Counsel for DBR, Inc.

LEHR MIDDLEBROOKS & VREELAND, P.C.
P.O. Box 11945
Birmingham, Alabama 35202-1945
(205) 326-3002
(205) 326-3008 (Fax)

s/Jackson B. Harrison
Jackson B. Harrison
lisaandbrett96@yahoo.com
Counsel for Plaintiff

The Harrison Firm, LLC
8425 Crossland Loop
Montgomery, AL 36117
(334) 819-8920
(334) 819-8923 (Fax)

CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Jackson B. Harrison, Esq.
The Harrison Firm, LLC
8425 Crossland Loop
Montgomery, AL 36117
lisaandbrett96@yahoo.com

Jack Linden McLean, Jr.
Holland & Knight LLP
1201 West Peachtree, N.W., Suite 2000
Atlanta, GA 30309-3400
jack.mclean@hklaw.com

Respectfully submitted,

s/Sally B. Waudby
Sally B. Waudby ASB-4704-W84S
OF COUNSEL